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BellSouth Telecommunications, Inc.333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

guy.hicks@bellsouth.com

T.R.A. DOCKET ROOM
July 24, 2003**Guy M. Hicks**
General Counsel615 214 6301
Fax 615 214 7406

VIA HAND DELIVERY

Hon. Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238Re: *Delta Phones, Inc. v. BellSouth Telecommunications, Inc.*
Docket No. 03-00425

Dear Chairman Tate:

Following is some additional information relevant to this proceeding, which BellSouth hopes will be useful to the Authority and its Hearing Officer:

1. Attached is a copy of a recent Citation issued to Delta Phones by the Louisiana Public Service Commission in Docket No. U-27390, *LPSC v. Delta Phones, Inc.* Among other things, the Citation issues a show cause to Delta Phones asking why it should not be found guilty of violating Commission orders for failure to maintain a performance bond.

2. Attached is a copy of a recent Order from the Alabama Public Service Commission in its Docket No. 27933 notifying Delta Phones that its Certificate of Public Convenience and Necessity will be revoked on August 14, 2003 unless Delta Phones demonstrates good cause before then as to why its Certificate should not be revoked.

3. Attached is a copy of a recent Order from the Kentucky Public Service Commission in its Docket No. 2003-00243 stating that if Delta Phones fails to file documents supporting the allegations in its Complaint by July 30, 2003, the Complaint shall be dismissed.

4. Paragraphs 7, 8 and 9 of Delta Phones' *Complaint and Petition for Expedited Relief* refer incorrectly to an interconnection agreement executed between the parties. For example, paragraph 8 states that

DPI [Delta Phones] and BellSouth executed an Interconnection Agreement ('IA' or 'Agreement'), together with various attachments incorporated therein on December 20, 2002. The agreement was filed with the Commission and was approved by order of the Commission on December 20, 2002 in Docket No. 02-01018. ... The Agreement, as amended from time to time, provides the terms and conditions pursuant to which BellSouth provides services to DPI for resale to its customers. Included in those services is the provision of both resold services and unbundled network elements ('UNEs'), according to various schedules which list the monthly recurring and nonrecurring charges associated therewith.

Because Delta Phones was never certificated in Tennessee as a CLEC, the regional interconnection agreement negotiated by the parties was not filed with the TRA. Instead, because Delta Phones was certificated in Tennessee as a reseller only, the parties negotiated a resale agreement. The resale agreement was approved by the Authority on November 4, 2002 in Docket No. 02-01018.

Both Delta Phones' Complaint and BellSouth's Answer incorrectly refer to provisions from the regional interconnection agreement rather than provisions from the resale agreement approved by the Authority. By this letter, BellSouth amends paragraphs 11 and 12 of its Answer to read as follows:

11. As to the allegations of Paragraph 8 of the Complaint, BellSouth admits that DPI and BellSouth executed a regional interconnection agreement but states that such agreement was not filed in Tennessee because DPI was not certificated as a CLEC. Instead, a resale agreement negotiated by the parties was filed and approved by the Authority on November 4, 2002 in Docket No. 02-01018.
12. BellSouth denies the allegations of Paragraph 9 of the Complaint. BellSouth specifically denies that DPI is authorized to use UNEs in Tennessee.

As information, the language relating to security deposits and termination of service is identical in both the regional interconnection agreement and Tennessee resale agreement.

Hon. Deborah Taylor Tate, Chairman
July 24, 2003
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5. Attached is a copy of Exhibit A to BellSouth's Answer, which was inadvertently omitted from BellSouth's Answer. Exhibit A is a copy of a June 2, 2003 letter sent to Delta Phones by BellSouth.

A copy of this letter is being provided to counsel for Delta Phones.

Very truly yours,

Guy M. Hicks

GMH:ch



Louisiana Public Service Commission

POST OFFICE BOX 91154
BATON ROUGE, LOUISIANA 70821-9154

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June 24, 2003

LAWRENCE C. ST. BLANC
Secretary

(MRS.) VON M. MEADOR
Deputy Undersecretary

EYE KARMO GONZALEZ
General Counsel

LOUISIANA PUBLIC SERVICE
COMMISSION
JUN 25 8 20 AM

Ms. Terri Lefebvre
Louisiana Public Service Commission
P.O. Box 91154
Baton Rouge, LA 70821-9154

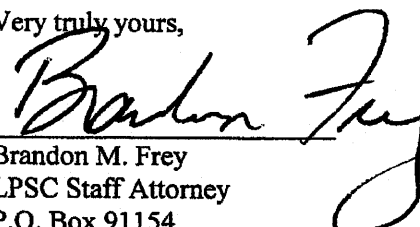
Re: Docket No. U-27390, LPSC v. Delta Phones, Inc.

Dear Ms. Lefebvre:

Please find attached an original and one copy of a citation issued to Delta Phones, Inc. which will be published in the Commission's next Official Bulletin.

Please return me a date stamped copy.

Very truly yours,


Brandon M. Frey
LPSC Staff Attorney
P.O. Box 91154
Baton Rouge, Louisiana 70821-9154
Telephone (225) 342-9888



Louisiana Public Service Commission

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Deputy Undersecretary

EVE KAHAO GONZALEZ
General Counsel

LOUISIANA PUBLIC SERVICE COMMISSION

VERSUS

DELTA PHONES, INC.

DOCKET NO. U-27390

In re: Alleged violation of Louisiana Public Service Commission General Order dated July 24, 2002, as amended, Section 301 (F), Section 301 (L) (5), Section 302 (A), Section 302 (B), Section 401 (F) (3) (b), Section 401 (F) (3) (c) and Section 901 (G).

Cert. Filed Receipt No. 70012510000111663370

VIA CERTIFIED U.S. MAIL and FACSIMILE (866) 824-8328

TO: Mr. Bob Lock
Delta Phones, Inc.
Post Office Box 784
Delhi, Louisiana 71232

GREETINGS:

YOU ARE HEREBY NOTIFIED, COMMANDED AND REQUIRED to appear at a hearing before a Louisiana Public Service Commission Hearing Examiner at a date to be determined in Baton Rouge, Louisiana:

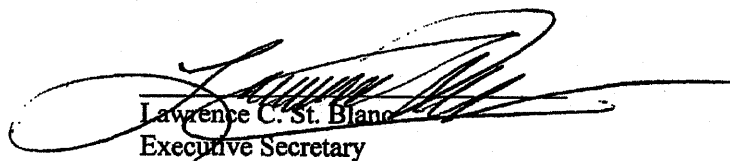
- a. TO SHOW CAUSE if any you have or can, why Delta Phones, Inc. should not be found guilty of violating Commission General Order dated July 24, 2002, as amended, Section 301 (L) (5), more specifically, for failing to possess adequate financial, managerial and/or technical abilities to provide service, and be fined \$10,000.00 and have its Certificate of Authority No. TSP00378 revoked.

- b. TO SHOW CAUSE if any you have or can, why Delta Phones, Inc. should not be found guilty of violating Commission General Order dated July 24, 2002, as amended, Section 401 (F) (3) (b), more specifically, for failing to file, by certified mail, with the Commission District Offices and Utilities Division a notarized affidavit verifying that it will either pay the undisputed amount owed to BellSouth Telecommunications, Inc. or that it will mail or send telephonic notice to its customers at least ten (10) days prior to the disconnection date listed on the notice and for failing to file a list of customer names and addresses under seal which shall be used by the Commission to provide notice to consumers as provided by these regulations, and be fined \$10,000.00 and have its Certificate of Authority No. TSP00378 revoked.
- c. TO SHOW CAUSE if any you have or can, why Delta Phones, Inc. should not be found guilty of violating Commission General Order dated July 24, 2002, as amended, Section 401 (F) (3) (c), more specifically, for failing to send a notice to end user customers notifying them that their telephone service may be subject to disconnect due to billing issues arising with BellSouth Telecommunications, Inc. unrelated to the customer's payment status and that they need to prepare other arrangements on or before the disconnect date to avoid loss of service, and be fined \$10,000.00 and have its Certificate of Authority No. TSP00378 revoked.
- d. TO SHOW CAUSE if any you have or can, why Delta Phones, Inc. should not be found guilty of violating Commission General Order dated July 24, 2002, as amended, Section 301 (F) (5), more specifically, for failing to maintain a performance bond, irrevocable letter of credit or other valid form of security, to cover prepayments and deposits of end users and be fined \$10,000.00 and have its Certificate of Authority No. TSP00378 revoked.
- e. TO SHOW CAUSE if any you have or can, why Delta Phones, Inc. should not be found guilty of violating Commission General Order dated July 24, 2002, as amended, Section 302 (A) & (B) & 901 (G), by failing to file the necessary annual and semi-annual reports with the Commission, and be fined \$10,000.00 and have its Certificate of Authority No. TSP00378 revoked.

If you are DISABLED and need special accommodations at this hearing, please notify the Louisiana Public Service Commission at least five (5) days prior to hearing date.

Page 3
Docket No. U-27390

BY ORDER OF THE COMMISSION
BATON ROUGE, LOUISIANA
June 24, 2003



Lawrence C. St. Blanc
Executive Secretary

cc: Commissioners
Legal Division
Utilities Division



STATE OF ALABAMA
ALABAMA PUBLIC SERVICE COMMISSION
P.O. BOX 304260
MONTGOMERY, ALABAMA 36130-4260

JIM SULLIVAN, PRESIDENT
JAN COOK, ASSOCIATE COMMISSIONER
GEORGE C. WALLACE, JR., ASSOCIATE COMMISSIONER

WALTER L. THOMAS, JR.
SECRETARY

DELTA PHONES, INC.,

DOCKET 27933

Applicant

ORDER

BY THE COMMISSION:

By Order entered in this cause on March 7, 2001, a Certificate was issued to Delta Phones, Inc. ("Delta Phones"), a Louisiana corporation, 245 Illinois Street, Delhi, Louisiana 71232, authorizing operations as a provider of Resold, Prepaid Local Exchange Telecommunications Service in the State of Alabama. That Order also required Delta Phones to maintain a \$10,000 surety bond. The required \$10,000 surety bond has not been maintained.

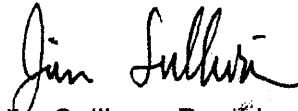
In light of Delta Phones' failure to comply with the bonding requirement established in the Commission's March 7, 2001 Order, it appears that Delta Phones' Certificate of Public Convenience and Necessity is due to be revoked unless Delta Phones can rectify the aforementioned deficiency within thirty (30) days of the effective date of this Order. We find this course of action to be consistent with the public interest, convenience and necessity.

IT IS, THEREFORE, ORDERED BY THE COMMISSION, That the Certificate of Public Convenience and Necessity previously issued to Delta Phones, Inc. pursuant to Commission Order dated March 7, 2001, is hereby revoked and cancelled thirty (30) days from the effective date of this Order unless Delta Phones, Inc. demonstrates good cause within said 30 days as to why its Certificate should not be revoked.

IT IS FURTHER ORDERED, That this Order shall be effective as of the date hereof.

DONE at Montgomery, Alabama, this 14th day of July, 2003.

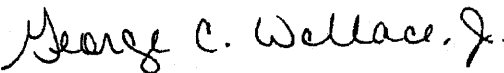
ALABAMA PUBLIC SERVICE COMMISSION



Jim Sullivan, President

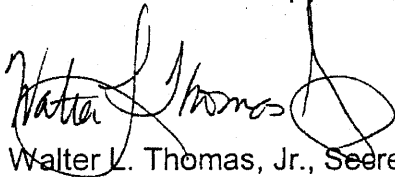


Jan Cook, Commissioner



George C. Wallace, Jr., Commissioner

ATTEST: A True Copy



Walter L. Thomas, Jr., Secretary

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN INVESTIGATION INTO A BILLING)	
DISPUTE BETWEEN DELTA)	
PHONES, INC. AND BELL SOUTH)	CASE NO. 2003-00243
TELECOMMUNICATIONS, INC.)	

O R D E R

On June 24, 2003, the Commission initiated, pursuant to KRS 278.260(1), an investigation into the billing dispute between Delta Phones, Inc. ("Delta Phones") and BellSouth Telecommunications, Inc. ("BellSouth"). Pursuant to that Order, Commission Staff met with BellSouth's and Delta Phones' representatives to discuss this dispute. No issues were resolved at that conference. On July 3, 2003, the Commission ordered the parties to present any and all documents to support their claims regarding the billing dispute. To date, Delta Phones has presented no evidence to support its allegations that BellSouth knowingly and consistently issued inflated and inaccurate bills to Delta Phones. The Commission finds that, unless such evidence is presented no later than July 30, 2003, this case should be dismissed, and BellSouth should implement its tariffed emergency continuity procedures for Delta Phones' customers.

The Commission, being otherwise sufficiently advised, HEREBY ORDERS that:

1. Delta Phones shall file, no later than July 30, 2003, any and all documents that support the allegations raised in the amended complaint filed with the Commission on July 8, 2003.

2. If Delta Phones fails to provide this documentation, this complaint shall be dismissed.

3. If Delta Phones provides documents to support the allegations raised in its amended complaint, the parties shall appear on August 13, 2003 at 9:00 a.m., Eastern Daylight Time, in Hearing Room 1 of the Commission's offices at 211 Sower Boulevard, Frankfort, Kentucky to present evidence regarding this billing dispute. Specifically, the parties shall present evidence demonstrating the total amount required per month to serve Delta Phones' current Kentucky customers.

Done at Frankfort, Kentucky, this 21st day of July, 2003.

By the Commission

ATTEST:


Executive Director

Case No. 2003-00243

BELLSOUTH

BellSouth Telecommunications, Inc.
800 North 19th Street
8th Floor
Birmingham, AL 35203

June 2, 2003

Ms. Jennifer Jandora
Delta Phones, Inc.
PO Box 127
Delhi, LA 71232

Re: Jennifer Jandora's Email dated May 16, 2003 entitled: "Bell South UNE-P Dispute"

Ms. Jandora:

This letter is in response to your e-mail dated May 16, 2003 entitled: "Bell South UNE-P Dispute". The four escalated items that you brought to my attention were:

1. \$650,000 Access Fees. We have not been able to bill CABS
2. UNEP Invoices for the last 2 months \$499,819.15 (How do we invoice our end users without electronic data?)
3. Zone inaccuracies can't place an estimate to this without electronic data.
4. \$110,000 Reciprocal Comp that we can not bill

First and foremost, these escalated items are not to be classified as "true" billing disputes as defined in the Parties' interconnection agreement ("Agreement") (Attachment 7, Section 2). These specific disputes relate to and involve the exchange of information and data between our two companies. Therefore, these disputes do not relate to actually invoiced "bills" and cannot be considered "billing disputes". Billing disputes are those that include invoiced bills to Delta Phones where payment is due on receipt to BellSouth for services rendered.

With respect to Optional Daily Usage File / Access Daily Usage File Records ("ODUF/ADUF Records") generally, I understand and acknowledge that Delta Phones needs this information and data in order to render billings or invoices to its own end user customers as well as render billings or invoices to other carriers. As provided for on numerous occasions through emails and letters, BellSouth has presented to Delta Phones alternative delivery options for receipt of ODUF/ADUF Records as well as alternative delivery options for the receipt of CRIS and CABS billing records in lieu of paper records.

The delivery options for ODUF and ADUF are:

- Delta Phones can still receive their ODUF Records that BellSouth is currently holding for Delta Phones, plus any new files by requesting MAGNETIC Cartridge Tape.
- Delta Phones may receive all ODUF/ADUF Records BellSouth is holding for Delta Phones, plus any new files using a CONNECT:Enterprise Secure FTP Mailbox (also called a BMX Mailbox).

Ms. Jennifer Jandora
June 2, 2003
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The delivery options for CRIS & CABS are:

- CRIS billing records via Paper, Diskette Analyzer Bill (DAB) CD & Paper, CONNECT:Enterprise Secure FTP Mailbox, Billing Magnetic Tape ("BMT"), or Electronic Data Interchange ("CLUB * EDISM").
- The CABS/UNE bill is only available in accordance with the Carrier Billing Output Specifications ("CBOS") standards, which is CABS Paper Bill or Billing Data Tape.

For ease of use, Deaveraged Zone information has been posted on the BellSouth Interconnection Website (www.interconnection.bellsouth.com) for access by all of our customers.

Responses to each of your escalated items are set forth below and include steps or actions for resolution of each item as well as what Delta Phones, Inc. could have done to prevent these issues from becoming an escalation or an issue in the first place..

I. Delta Phones Concern:

"\$650,000 Access Fees. We have not been able to bill CABS"

A. Short Description of Issue:

Based on the information that we discussed in our face-to-face meeting on April 25, 2003 concerning this matter, Delta Phones has misclassified "CABS" with what is really classified as ODUF & ADUF Records. The ADUF Records that Delta Phones is seeking to obtain from BellSouth is needed by Delta Phones to bill access originated and/or terminating usage to interexchange carriers. The amount of money (\$650,000 Access Fees) stated by Delta Phones as a "billing dispute" is in reality an amount of money Delta Phones alleges it can collect from interexchange carriers that have been Pre-subscribed (PIC'd) to Delta Phones' end users. .

B. BellSouth Response:

BellSouth provided Delta Phones with information on what specific delivery methods were and are still available for receiving ODUF/ADUF Records from BellSouth.

i. Background Correspondence Between BellSouth and Delta Phones:

On January 23, 2003, Rhonda Walters of Delta Phones contacted Andy Plummer of BellSouth about setting up the ODUF/ADUF Records. Andy Plummer provided information regarding the products to Rhonda Walters, and he answered questions regarding the discussed delivery options. Andy emailed an overview of ODUF/ADUF Records to Rhonda later that day with information on File Delivery, Internet links for ODUF/ADUF Records documentation, Internet links for purchasing the EMI documentation from ATIS and the Internet web link for Sterling Commerce (delivery software). Questionnaires were attached to this email for two electronic delivery options for ODUF/ADUF file delivery. Specifically, the following information was shared with Rhonda, verbally and via email on January 23, 2003:

1. Delta Phones can still receive their ODUF Records that BellSouth is currently holding for Delta Phones, plus any new files by requesting MAGNETIC Cartridge Tape.
2. ADUF is not available on MAGNETIC Cartridge tape.
3. Delta Phones may receive all ODUF/ADUF Records BellSouth is holding for Delta Phones, plus any new files using a CONNECT:Enterprise Secure FTP Mailbox (also called a BMX Mailbox).
4. The cost of the BMX Mailbox software for this service is a one-time non-recurring charge by the software vendor, Sterling Commerce, of approximately \$150.00.

ii. Chronology of Events Regarding Turn-up of ODUF/ADUF Records for Delta Phones:

- Rhonda Walters requested DUF on January 30, 2003.
- BellSouth activated ODUF/ADUF Records for Delta Phones on January 31, 2003.
 - The first ODUF file was created on February 1, 2003.
 - The first ADUF file was created on February 3, 2003.
- Until CONNECT:Direct is tested and turned up, BellSouth Billing Incorporated ("BBI") will hold all of Delta Phones ADUF & ODUF Records/Files unless requested otherwise by the customer.
- Delta Phones has alternative means of receiving ODUF/ADUF Records as provided for above

If Delta Phones would like to receive any held or future ODUF/ADUF Records over one of the alternative delivery methods as mentioned above, please contact Andy Plummer at 205-321-4321 for further assistance. The setup time for the MAGNETIC Tape (option 2) is seven (7) calendar days from the written request, and the setup time for the CONNECT:Enterprise Secure FTP Mailbox is twenty-one (21) calendar days from the written request. If the CONNECT:Enterprise FTP Mailbox is the preferred method of choice for Delta Phones, Delta Phones will need to install CONNECT:Enterprise Secure FTP Command Line software from Sterling Commerce.

URLs for ODUF and ADUF Information

- ODUF:
http://www.interconnection.bellsouth.com/guides/other_guides/pdf/chapter4/ch4sec3.pdf
- ADUF:
http://www.interconnection.bellsouth.com/guides/other_guides/pdf/chapter4/ch4sec2.pdf

2. Delta Phones Concern:

"UNEP Invoices for the last 2 months \$499,819.15 (How do we invoice our end users without electronic data?)"

A. Short Description of Issue:

BellSouth believes this issue consists of Delta Phones' belief that it cannot bill its end users from the paper bills it currently receives from BellSouth each month.

B. BellSouth Response:

BellSouth provides documentation to our CLEC customers for every Billing and Delivery Option available to the CLEC. The default option for the delivery of CRIS and CABS records is paper. Only if directed otherwise by the CLEC will BellSouth provide an alternative format for the delivery of CRIS and CABS billing records in lieu of the paper document.

Prior to May 19, 2003, Delta Phones requested that CRIS and CABS records be transmitted via the CONNECT:Direct. In order for any CLEC to receive billing files via CONNECT:Direct, the CLEC must have a dedicated LAN-to-LAN connection in place with BellSouth. The CLEC must also complete a CONNECT:Direct questionnaire provided by BellSouth. Once the CONNECT:Direct questionnaire is completed and all of the information is verified, provisioning takes approximately ninety (90) calendar days to implement the request. The request is then handed off to the appropriate CONNECT:Direct subject matter expert ("SME") and funding is requested from the CLEC to complete the provisioning process.

Ms. Jennifer Jandora
June 2, 2003
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Until CONNECT:Direct for Delta Phones has been tested and turned up, the interim solution for Delta Phones is to receive CRIS billing records is via Paper, Diskette Analyzer Bill ("DAB") CD & Paper, CONNECT:Enterprise Secure FTP Mailbox, Billing Magnetic Tape ("BMT"), or Electronic Data Interchange ("CLUB * EDISM"). The CABS/UNE bill is only available in accordance with the Carrier Billing Output Specifications ("CBOS") standards, which is CABS Paper Bill or Billing Data Tape.

Since the effective date of Delta Phones' interconnection agreement with BellSouth, Delta Phones has appropriately received paper invoices and DAB CD & paper invoices for the following (see below) Billing Account Numbers ("BANs"):

205Q863131131 E	Paper only
305Q863131131 E	Paper only
318Q863131131 E	Paper only
502Q863131131 E	Paper only
561Q863131131 E	Paper only
601Q863131131 E	Paper only
704Q863131131 E	Paper only
803Q863131131 E	Paper only
904Q863131131 E	Paper only
205Q984910910 R	DAB CD and Paper
305Q984910910 R	DAB CD and Paper
318Q984910910 R	DAB CD and Paper
502Q984910910 R	DAB CD and Paper
561Q984910910 R	DAB CD and Paper
601Q984910910 R	Paper only
615Q984910910 R	DAB CD and Paper
704Q984910910 R	DAB CD and Paper
803Q984910910 R	DAB CD and Paper
904Q984910910 R	DAB CD and Paper

On May 5, 2003, via email, Jennifer Jandora sent Carolyn Ward, Local Contract Manager for BellSouth, a request that stated: "Can we please have all Delta Phones billing electronically". Per this May 5, 2003 e-mail request, BellSouth will begin providing Delta Phones CRIS and CABS billing records on CD where available. This change in procedure will take effect on the *next billing cycle* for each account. As for the CONNECT:Enterprise Secure FTP Mailbox, BellSouth stands ready to assist Delta Phones in establishing this means for delivery of Delta Phones' CRIS billing records via a FTP Mailbox. For more information, please refer to the following websites:

BellSouth CLEC Billing Guide

http://www.interconnection.bellsouth.com/guides/html/understanding_bill.html

Billing and Delivery Options Overview - Chapter III: Billing and Delivery Options

http://www.interconnection.bellsouth.com/guides/other_guides/pdf/chapter3/ch3sec5.pdf

3. Delta Phones Concern:

"Zone inaccuracies can't place an estimate to this without electronic data."

A. Short Description of Issue:

Delta Phones is seeking Deaveraged Zone data on the BellSouth Central Offices and not just Zone data, which is an entirely separate piece of information. Deaveraged Zone data is needed by Delta Phones to determine if BellSouth correctly applied the Deaveraged Zone rates on UNE-P lines Delta Phones ordered from BellSouth.

Ms. Jennifer Jandora
June 2, 2003

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B. BellSouth Response

BellSouth is unaware of any issue that Delta Phones has with the "Zone inaccuracies". To assist with this issue, however, I have again provided the URL below (BellSouth Geographically Deaveraged Unbundled Network Element (UNE) Rate Zones) that provides Delta Phones with a way to obtain the BellSouth Deaveraged Zone information in an Excel spreadsheet. If Delta Phones is requesting Zone information that is different from the BellSouth Geographically Deaveraged Unbundled Network Element (UNE) Rate Zones, then the Local Exchange Routing Guide ("LERG") or the NECA Tariff should contain Zone information as well.

Per my May 8, 2003 e-mail to Jennifer Jandora:

"Jennifer, I received word from the BellSouth Billing & Collections Group that you were looking for information on the Deaveraged Zones within the BellSouth Region. I have included the URL from the BellSouth Interconnection Website that you can use to pull the needed information.

BellSouth Interconnection Website

URL: <http://www.interconnection.bellsouth.com>

BellSouth Geographically Deaveraged Unbundled Network Element (UNE) Rate Zones

URL: http://www.interconnection.bellsouth.com/become_a_clec/html/deaverage.html

If you have any question or comments about this information please feel free to contact Carolyn Ward (Local Contract Manager), 205-321-4944 or myself at 205-321-4970."

This issue "Zone inaccuracies can't place an estimate to this without electronic data" has been closed because access to this information was provided to you on May 8, 2003. BellSouth has also provided to you the opportunity to contact us with any questions or comments. As of the date of this letter, BellSouth has received no correspondence from Delta Phones. As such, I will conclude that you have access to the information you requested.

4. Delta Phones Concern:

""\$110,000 Reciprocal Comp that we can not bill"

A. Short Description of Issue:

I am not sure what the issue is concerning Reciprocal Compensation, as it is my understanding that BellSouth and Delta Phones have not interconnected any facilities which is required for reciprocal compensation payments.

B. BellSouth Response

This issue regarding "\$110,000 Reciprocal Comp that we can not bill" was escalated to Richard McIntire at BellSouth. I discussed this issue with Richard and we agreed that I would respond to this issue as well.

Ms. Jennifer Jandora
June 2, 2003
Page 6

BellSouth cannot understand what Delta Phones is referring to by stating it has a "Reciprocal comp" issue. Delta Phones carries no access service and has no facilities that BellSouth is aware of that would provide for reciprocal compensation payments between the Parties. Please further explain what Delta Phones is requesting and what data it is referring to in its conclusions. After you have reviewed this information, should you have any questions, please feel free to call me at (205) 321-4970 or send your questions via e-mail. Based on your escalated issues and my response to these issues, BellSouth considers the above items closed.

5. Conclusion Summary of Delta Phones' Requests Related to Non-Billing Issues

For future reference, and to avoid any additional issues related to the items discussed in this letter, I would like to take this opportunity to summarize the information provided above and on previous occasions, and explain what Delta Phones could have done to prevent these issues.

- For the "\$650,000 Access Fees. We have not been able to bill CABS" and "UNEP Invoices for the last 2 months \$499,819.15 (How do we invoice our end users without electronic data?)" issues, Delta Phones could have chosen to utilize the CONNECT:Enterprise Secure FTP Mailbox in January 2003 while waiting for the LAN-to-LAN connection and the needed CONNECT:Direct connections to be tested and turned up.
 - Information on the Billing and Delivery Options the CLEC may utilize as well as information about ODUF & ADUF can be found on the BellSouth Interconnection Website.
- For the "Zone inaccuracies can't place an estimate to this without electronic data" issue, I would recommend that Delta Phones become more familiar with the BellSouth Interconnection Website and the user guides available on it for all CLECs. The website is a very useful tool for CLECs and provides a comprehensive search engine that can be used to search such phrases as "Zone" or "Deaveraged Zone".
 - Additionally, BellSouth places on our website Product & Service information packages that our CLEC customers can access in order to obtain a better understanding of the product or service. These packages provide our customer with information, such as what the product/service is, how the product/service works, the requirements, ordering & billing information, etc.
 - <http://www.interconnection.bellsouth.com/guides/html/unec.html>
 - <http://interconnection.bellsouth.com/products/html/resale.html>
 - Also, BellSouth provides our Wholesale customer with several training classes they can attend, the below URL will take you to the BellSouth Training Website.
 - http://interconnection.bellsouth.com/training/html/elec_class_info.html

BellSouth considers the above issues closed at this time. Should you wish to discuss further, please email or contact me directly at (205) 321-4970.

Sincerely,



William D. French
Sales Support Director

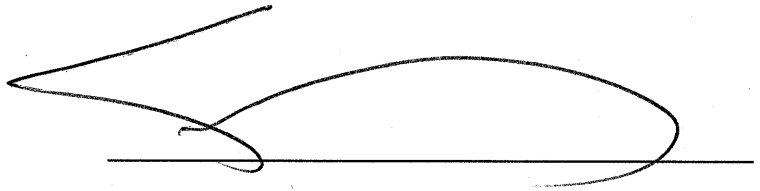
cc: Gary Patterson, Operations Assistant Vice President
Heidi Beard, Manager
Richard McIntire, Operations Director

CERTIFICATE OF SERVICE

I hereby certify that on July 24, 2003, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☐ Hand
- ☐ Mail
- ☒ Facsimile
- ☐ Overnight
- ☐ Electronic

Henry Walker, Esquire
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A handwritten signature in black ink, appearing to be "H. Walker", is written over a horizontal line.